

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF MARYLAND**

In re:

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KYONGSIK JUN
MINSOO HA
Debtor

*

Case No. 23-1-3312-MCR
(Chapter 13)

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**RESPONSE OF BMW FINANCIAL SERVICES NA, LLC TO DEBTORS' MOTION
TO SELL AUTOMOBILE**

BMW Financial Services NA, LLC (hereinafter "BMW") files its response to the Debtors' Motion To Sell Automobile and states as follows:

1. Respondent is without information sufficient to form a belief as to the truth of the allegations contained in Paragraphs 1 through 6 of the Motion.
2. In further answering, BMW submits it holds the perfected purchase money security interest in the vehicle and its lien must be paid from the vehicle's sale proceeds. As of October 20, 2025, the amount of BMW's claim secured by the vehicle was \$5,713.89.

WHEREFORE, Respondent, BMW Financial Services NA, LLC, respectfully requests the Court deny the Debtors' Motion To Sell Automobile.

/s/Michael J. Klima, Jr.
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8028 Ritchie Highway
Suite 300
Pasadena, MD 21122
(410)768-2280
Attorney File: 26-60995

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on October 27, 2025, a copy of the foregoing Response Of
BMW Financial Services NA, LLC To Debtors' Motion To Sell Automobile was
electronically served on:

Bartholomew Choi
Email: bchoi@wandsfirm.com

Christopher Rollis Wampler
Email: cwampler@wandsfirm.com

Timothy P. Branigan
Email: cmecf@chapter13maryland.com

/s/Michael J. Klima, Jr.

Michael J. Klima, Jr.